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*Proposed Counsel for Official
Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ROBERT A.
JULIAN IN SUPPORT OF *EX PARTE*
APPLICATION FOR ENTRY OF AN
ORDER SUPPLEMENTING THE
RECORD ON THE CORRECTED
MOTION OF DEBTORS PURSUANT TO
11 U.S.C. §§ 105(a), 363, AND 503(c) FOR
ENTRY OF AN ORDER (I) APPROVING
SHORT-TERM INCENTIVE PLAN AND
(II) GRANTING RELATED RELIEF
(Dkt. No. 806)**

[No hearing requested]

1 I, Robert A. Julian, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information and belief:

4 1. I am a partner at Baker & Hostetler, LLP (“**Baker Hostetler**”), proposed counsel
5 to the Official Committee of Tort Claimants (the “**TCC**”) in the above captioned chapter 11 cases
6 of PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**”). I
7 make this declaration in support of the *Ex Parte* Application (the “**Application**”) of the TCC for
8 entry of an order supplementing the record on the Corrected Motion of Debtors Pursuant to 11
9 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan
10 and (II) Granting Related Relief. The Application is filed concurrently herewith.

11 2. On March 28, 2019, the TCC filed its Opposition to the Motion (Dkt. No. 1109).

12 3. On April 2, 2019, the United States District Court for the Northern District of
13 California held a hearing (the “**District Court Hearing**”) in *U.S. v. Pacific Gas and Electric Co.*,
14 Case No. 3:14-cr-00175 (WHA) (N.D. Cal.). On April 3, 2019, in that same action, the District
15 Court entered an Order Adopting New Conditions of Probation, dated April 3, 2019 (Dkt. No.
16 1040) (“**District Court Order**”). The transcript of the District Court Hearing is attached hereto
17 as **Exhibit A** and the District Court Order is attached hereto as **Exhibit B**.

18 4. On April 4, 2019, I asked Richard Slack of Weil, Gotshal & Manges LLP,
19 proposed counsel to the Debtors, whether the Debtors would agree to supplementing the record
20 on the Motion with the transcript of the District Court Hearing and the District Court Order. On
21 April 4, 2019, Mr. Slack responded via email that the Debtors consented to supplement the record
22 with the transcript of the District Court Hearing and the District Court Order.

23 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
24 inquiry, the foregoing is true and correct and that this declaration was executed at San Francisco,
25 California, on April 8, 2019.

26 /s/ Robert A. Julian
27 Robert A. Julian
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